

-----X	
JASON WILLIAMS,	: Case No. 5:19-cv-00475-BO
	:
Plaintiff,	:
	:
v.	:
	:
AT&T MOBILITY LLC,	: <b>PLAINTIFF’S PROPOSED</b>
	:
Defendant.	: <b>VERDICT FORM</b>
	:
-----X	

## Violation of § 222 of the Federal Communications Act

- Yes \_\_\_\_\_ No \_\_\_\_\_

Yes \_\_\_\_\_ No \_\_\_\_\_

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3. What amount of damages has Mr. Williams sustained as a result of AT&T's acts or omissions?

\$\_\_\_\_\_.

**COUNT II**

**Violation of North Carolina's Unfair and Deceptive Trade Practices Act, N.C. Gen Sta. Ann. § 75-1.1**

1. Do you find by a preponderance of the evidence that defendant AT&T engaged in unfair and/or deceptive acts or practices regarding the security of Mr. Williams' personal information and data, including CPNI?

Yes \_\_\_\_\_ No \_\_\_\_\_

2. Intentionally misled its customers regarding its security and data protection practices in order to attract customers?

Yes \_\_\_\_\_ No \_\_\_\_\_

*If you answered "Yes" to either Questions 1 or 2, proceed to Question 3.*

*If you answered "No" to both Questions 1 and 2, do not answer the remaining questions for Count II and proceed to Count III.*

3. As to the acts in Question 1 to which you answered "yes," do you find by a preponderance of the evidence that AT&T's conduct proximately caused Mr. Williams' injury(ies)?

Yes \_\_\_\_\_ No \_\_\_\_\_

*If your answer to Question No. 3 is "no," do not answer the remaining questions for Count II and proceed to Count III. If your answer to Question No. 3 is "yes," proceed to Question No. 4.*

4. What amount of damages has Mr. Williams sustained as a result of AT&T's acts in Question 1 to which you answered "Yes"?

\$ \_\_\_\_\_.

### **COUNT III**

#### **Negligence**

1. Do you find by a preponderance of the evidence that defendant AT&T breached its duty to exercise reasonable care owed to the plaintiff?

Yes \_\_\_\_\_ No \_\_\_\_\_

*If your answer to Question No. 1 is "no," do not answer the remaining questions for Count III and proceed to Count IV. If your answer to Question No. 1 is "yes," proceed to Question No. 2.*

2. Did AT&T's breach of its duties proximately cause Mr. Williams' injuries?

Yes \_\_\_\_\_ No \_\_\_\_\_

*If your answer to Question No. 2 is "no," do not answer the remaining questions for Count III and proceed to Count IV. If your answer to Question No. 2 is "yes," proceed to Question No. 3.*

3. What amount of damages is Mr. Williams entitled to recover from defendant AT&T as a result of AT&T's negligence?

\$ \_\_\_\_\_.

### **COUNT IV**

#### **Negligent Supervision**

1. Do you find by a preponderance of the evidence that defendant AT&T breached its duty to supervise its agents and employees?

Yes \_\_\_\_\_ No \_\_\_\_\_

*If your answer to Question No. 1 is "no," do not answer the remaining questions for Count IV and proceed to Count V. If your answer to Question No. 1 is "yes," proceed to Question No. 2.*

2. Did AT&T's negligent supervision proximately cause Mr. Williams' injuries?

Yes \_\_\_\_\_ No \_\_\_\_\_

*If your answer to Question No. 2 is "no," do not answer the remaining questions for Count IV and proceed to Count V. If your answer to Question No. 2 is "yes," proceed to Question No. 3.*

3. What amount of damages is Mr. Williams entitled to recover from defendant AT&T as a result of AT&T's negligent supervision?

\$ \_\_\_\_\_.

#### **COUNT V**

#### **Violation of NC Anti-Hacking Statute**

1. Did AT&T violate North Carolina's Computer Trespass / Anti-Hacking Statute?

Yes \_\_\_\_\_ No \_\_\_\_\_

*If your answer to Question No. 1 is "no," do not answer the remaining questions for Count V. If your answer to Question No. 1 is "yes," proceed to Question No. 2.*

2. In what amount has Mr. Williams been damaged as a result of AT&T's conduct?

\$ \_\_\_\_\_.

*Once you have completed answering the questions in Counts I-V above, please sign and date this verdict form and notify the bailiff.*

Dated: \_\_\_\_\_

PRESIDING JUROR: